

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PRINCETON DIGITAL IMAGE CORPORATION,)
)
 PLAINTIFF,)
)
 V.)
)CASE NO.: 1:12-CV-00779-RJS
 HEWLETT-PACKARD COMPANY,)
 FUJIFILM NORTH AMERICA)ECF CASE
 CORPORATION F/K/A FUJIFILM U.S.A.,)
 INC. AND XEROX INTERNATIONAL)
 PARTNERS,)
)
 DEFENDANTS.)

**MEMORANDUM OF LAW IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION TO REDACT HEARING TRANSCRIPT
AND FILE UNDER SEAL**

Plaintiff Princeton Digital Image Corporation (“PDIC”), by and through the undersigned counsel, Duane Morris LLP, hereby submits this memorandum of law in support of its request to file under seal certain portions of the transcript from the Court’s May 17, 2012 hearing (the “Transcript”) to be publicly available and to file the un-redacted version of the Transcript under seal.

In the May 17, 2012 hearing, the parties conducted oral argument with respect to the Motion to Dismiss for Lack of Standing Pursuant to Federal Rule of Civil Procedure 12(b)(1) filed by defendants Hewlett-Packard Company, Fujifilm North America Corporation, and Xerox International Partners. During that hearing, the parties and the Court disclosed information from documents (“Protected Information”) that were filed under seal pursuant to this Court’s Order dated April 24, 2012. Accordingly, PDIC respectfully requests that portions of the Transcript which disclose Protected Information be redacted from the public version of the Transcript and

that the un-redacted version of the Transcript be filed under seal, consistent with this Court's Order dated April 24, 2012. The portions of the hearing transcript which PDIC seeks to redact are highlighted in Exhibit A to the Declaration of R. Terry Parker.

Dated: June 14, 2012

Respectfully submitted,

By: /s/
DUANE MORRIS, LLP
Gregory M. Luck, P.C. (*admitted pro hac vice*)
Thomas W. Sankey, P.C. (*admitted pro hac vice*)
Diana M. Sangalli (*admitted pro hac vice*)
Wesley W. Yuan (*admitted pro hac vice*)

1330 Post Oak Blvd, Suite 800
Houston, Texas 77056
Telephone: (713) 402-3900
Facsimile: (713) 583-9623

R. Terry Parker
1540 Broadway
New York, New York 10036
Telephone: (212) 692-1089
Facsimile: (212) 214-0725

Jeffrey S. Pollack (*admitted pro hac vice*)
30 South 17th Street
Philadelphia, PA 19103-4196
Telephone: (215) 979-1299
Facsimile: (215) 689-4942

Kristina Caggiano (*pro hac vice*)
Suite 1000
505 9th Street, N.W.
Washington, DC 20004-2166
Telephone: (202) 776-5284
Facsimile: (202) 2478-2965

*ATTORNEYS FOR PLAINTIFF,
PRINCETON DIGITAL IMAGE
CORPORATION*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that pursuant to Fed. R. Civ. P. 5(d) all counsel of record were served with a correct copy of the foregoing by CM/ECF Electronic Service on this the 14th day of June 2012.

William H. Mandir (wmandir@sughrue.com)
Yoshinari Kishimoto (ykishimoto@sughrue.com)
Brian K. Shelton (bshelton@sughrue.com)
Kelly G Hyndman(kghyndman@sughrue.com)
John F Rabena (jrabena@sughrue.com)
Mark J. Deboy (mdeby@sughrue.com)
Sughrue Mion PLLC
2100 Pennsylvania Ave., NW
Washington, DC 20037

J. Thad Heartfield (thad@jth-law.com)
M. Dru Montgomery (dru@jth-law.com)
The Heartfield Law Firm

Richard A. Williamson (rwilliamson@fzwz.com)
Craig S. Kesch (ckesch@fzwz.com)
Flemming Zulack Williamson Zauderer, LLP
One Liberty Plaza
New York, NY 10006

*Attorneys for Defendant
Xerox International Partners*

Steven J. Routh (srouth@orrick.com)
Sten A. Jensen (sjensen@orrick.com)
Orrick, Herrington & Sutcliffe LLP
1152 15th Street, NW
Washington DC 20005

Clifford R. Michel (cmichel@orrick.com)

*Attorneys for Defendant
Fujifilm North America Corporation*

Brian K. Erickson (brian.erickson@dlapiper.com)
DLA Piper US LLP
401 Congress Ave., Suite 2500
Austin, TX 78701-3799

Erin P. Gibson (erin.gibson@dlapiper.com)

Sean C. Cunningham (scunningham@graycary.com)
Gray Cary Ware & Freidenrich, LLP
4365 Executive Dr., Suite 1100
San Diego, CA 92101

*Attorneys for Defendant
Hewlett-Packard Company*

/s/

Edwin Grullon

DMI\3371970.1